

AUG 08 2012

UNITED STATES DISTRICT COURT  
IN THE WESTERN DISTRICT COURT OF NORTH CAROLINA

U.S. DISTRICT COURT  
WESTERN DISTRICT OF NC

Regina Boston  
Plaintiff.

Case No. 3:12cv494

-v-

CROWN ASSET MANAGEMENT LLC  
(‘Crown’)  
Defendant.

**COMPLAINT**

Regina Boston, hereby sues Defendant, CROWN ASSET MANAGEMENT LLC.; and alleges:

**PRELIMINARY STATEMENT**

1. This is an action for damages brought for damages for violations of the Fair Credit Reporting Act (FCRA) 15 U.S.C. §1681 *et seq.*

**JURISDICTION AND VENUE**

2. The jurisdiction of this Court is conferred by 15 U.S.C. §1681p.
3. Venue is proper in this Circuit pursuant to 28 U.S.C. §1391b.
4. This is an action for damages which do not exceed \$1,000.00.
5. Plaintiff, Regina Boston is a natural person and is a resident of the State of North Carolina.
6. Defendant, CROWN, is a Georgia Corporation, and is authorized to do business in North Carolina.
7. All conditions precedent to the bringing of this action have been performed, waived or excused.

**FACTUAL ALLEGATIONS**

8. On 10/26/2010, CROWN pulled Plaintiff’s credit report without a permissible purpose which appears as an inquiry on her Experian credit report.

9. Plaintiff contacted and spoke to Michelle Chelsey at extension 419 of Crown on July 6, 2012 to inquire of the pull.

### **COUNT I**

#### **VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681 WILLFUL NON-COMPLIANCE BY DEFENDANT CROWN ASSET MANAGEMENT LLC.**

10. Paragraphs 1 through 9 are realleged as though fully set forth herein.

10. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

11. CROWN is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

12. CROWN willfully violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) CROWN willfully violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages against CROWN for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to 15 U.S.C. §1681n.

### **COUNT II**

#### **VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681 NEGLIGENT NON-COMPLIANCE BY DEFENDANT CROWN**

13. Paragraphs 1 through 12 are realleged as though fully set forth herein.

14. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

15. CROWN is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

16. CROWN negligently violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) CROWN negligently violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages against CROWN for actual damages, and attorney's fees and costs, pursuant to 15 U.S.C. §1681o.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury of all triable issues as a matter of law.

Dated: August 8, 2012

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Regina Boston".

Regina Boston  
1220 Ballina Way  
Charlotte, NC 28214